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8 **BEFORE THE**  
9 **BOARD OF REGISTERED NURSING**  
10 **DEPARTMENT OF CONSUMER AFFAIRS**  
**STATE OF CALIFORNIA**

11 In the Matter of the Accusation Against:

Case No. 2011-1746

12 **TERESA ANN JOHNSON, AKA**  
13 **TERESA ANN JAKOBI, AKA**  
**TERESA BOWMAN**  
14 **5841 Olive Street**  
**Anderson, CA 96007**  
15 **Registered Nurse License No. 429266**

**A C C U S A T I O N**

16 Respondent.

17 Complainant alleges:

18 **PARTIES**

19 1. Louise R. Bailey, M.Ed., RN ("Complainant") brings this Accusation solely in her  
20 official capacity as the Executive Officer of the Board of Registered Nursing ("Board"),  
21 Department of Consumer Affairs.

22 **Registered Nurse License**

23 2. On or about August 31, 1988, the Board issued Registered Nurse License Number  
24 429266 to Teresa Ann Johnson, also known as Teresa Ann Jakobi and Teresa Bowman  
25 ("Respondent"). The registered nurse license was in full force and effect at all times relevant to  
26 the charges brought herein and will expire on April 30, 2012, unless renewed.

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1 the licensing act to pay a sum not to exceed the reasonable costs of the investigation and  
2 enforcement of the case.

3 **FIRST CAUSE FOR DISCIPLINE**

4 **(Criminal Conviction)**

5 8. Respondent has subjected her license to discipline pursuant to Code section 2761,  
6 subdivision (f), in that on or about September 10, 2008, in the Superior Court, County of Shasta,  
7 California, in the matter entitled *People vs. Teresa Ann Johnson*, 2008, Case No. 08TR927,  
8 Respondent was convicted by a jury of violating Vehicle Code section 23152, subdivision (a)  
9 (driving under the influence of alcohol or drugs), a misdemeanor and Vehicle Code section  
10 23152, subdivision (b) (driving while having a blood alcohol of .08% or higher), a misdemeanor.

11 The circumstances of the crime are that on or about January 11, 2008, the California Highway  
12 Patrol answered a call at the Happy Valley Market regarding a possible intoxicated driver. The  
13 officers were provided with a description of Respondent's vehicle, as well as the license plate  
14 number. Officers located Respondent at her residence and arrested her. Respondent was  
15 transported to the Shasta County Jail where she completed breath tests, which resulted in blood  
16 alcohol levels of .28% and .26%. Such conduct is substantially related to the qualifications,  
17 functions, and duties of a licensed registered nurse.

18 **SECOND CAUSE FOR DISCIPLINE**

19 **(Conviction of a Crime Involving Alcohol)**

20 9. Respondent has subjected her license to discipline pursuant to Code section 2761,  
21 subdivision (a), on the grounds of unprofessional conduct, as defined by Code section 2762,  
22 subdivision (c), in that Respondent has been convicted of a crime involving the consumption of  
23 alcohol, as more particularly set forth in paragraph 8, above.

24 **THIRD CAUSE FOR DISCIPLINE**

25 **(Use Alcohol to an Extent or in a Manner Dangerous or Injurious)**

26 10. Respondent has subjected her license to discipline pursuant to Code section 2761,  
27 subdivision (a), on the grounds of unprofessional conduct, as defined in Code section 2762,  
28 subdivision (b), in that on or about January 11, 2008, Respondent used alcohol to an extent or in a

1 manner dangerous or injurious to herself or others, as more particularly set forth in paragraphs 8,  
2 above.

3 **PRAYER**

4 WHEREFORE, Complainant requests that a hearing be held on the matters herein alleged,  
5 and that following the hearing, the Board of Registered Nursing issue a decision:

- 6 1. Revoking or suspending Registered Nurse License Number 429266, issued to Teresa  
7 Ann Johnson, also known as Teresa Ann Jakobi and Teresa Bowman;  
8 2. Ordering Teresa Ann Johnson, also known as Teresa Ann Jakobi and Teresa Bowman  
9 to pay the Board of Registered Nursing the reasonable costs of the investigation and enforcement  
10 of this case, pursuant to Business and Professions Code section 125.3; and,  
11 3. Taking such other and further action as deemed necessary and proper.

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14 DATED: 3/4/11

15 *for*

*Stacie Ben*

16 LOUISE R. BAILEY, M.ED., RN  
17 Executive Officer  
18 Board of Registered Nursing  
19 Department of Consumer Affairs  
20 State of California  
21 Complainant  
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